

From: [Don Edgington](#)
To: [Muegge, Cheryl](#); [Alderete, Chris](#)
Cc: [Moore, Gary](#); [Delgado, Paige](#); [Evan Wortman](#)
Subject: C&D Profile No. 34161818258 - F.J. Doyle Salvage Site - Leonard, Texas
Date: Saturday, November 03, 2018 9:17:55 AM

Good morning, Cheryl.

I've taken the liberty to correct some of my initial responses to you and your analyst with Gary Moore's comments. I was incorrect in stating that the wipe samples were taken "from all building surfaces". Actually, the wipe samples were only taken from sheet metal surfaces, which is the primary building material in question. Additionally, it is the government's intent to recycle the metals and not ship them to you.

Bottom line, we do not have any analysis for the wood or concrete surfaces. If Republic needs this data to approve Profile No. 34161818258, we'll need to have Chris arrange to drop at least 3 open-top roll-offs to place the non-metallic C&D debris in then collect samples to characterize.

Gary Moore will respond to any additional questions regarding the waste profile as the generator's representative.

Chris, please prepare a separate quotation to deliver 3 30 yd O/T roll-offs to the site for Thursday AM. Based on the outcome of any sampling that occurs, we'll have Republic take the roll-offs to Itasca, Pleasant Oaks or Maloy as appropriate.

The following is Gary's corrections and answers to the original questions from your analyst.

From Gary Moore, On-Scene Coordinator, USEPA Region 6

Hello Cheryl:

I wanted to provide some supplemental information to the information provided by Don Edgington, EPA Contractor, provided you earlier today to try to answer your questions:

1. **What purpose was the building used on site?** This building was used as FJ Doyle Salvage from approximately 1976 to 1999. I was told that the transformers were empty (contained residual transformer oil) when they came to the site. The residual transformer oil was drained into a pan on the floor of the building and then pumped into outside tanks. The transformers were then dismantled to remove the metal parts for recycling as well as recycling of the transformer carcasses. After 1999, I was told that the property was used to store old trucks and parts and then as an auto repair facility and finally just for storage.
2. **What activities or processes occurred in the building?** See information in question 1 above.
3. **What possible contaminants may have been used in it?** A reasonable assumption is that some organic materials may have been spilled (transformer oil, auto fluids, etc. on the building floor, probable copper, lead and other minute amounts of metals from the metal salvage

activities.

4. **How was it determined that no contamination exists in the materials that is to be disposed?** See attached analytical report; specifically analyses on 16 wipe samples taken from sheet metal both inside and out including interior ceiling areas inside the structure to be demolished. The concrete and wood debris will have to be sampled to determine the appropriate waste stream.
5. **Please have the generator describe their process for ensuring no contaminated materials is designated for inclusion with C&D for disposal. Additional analytical may be required.** The building will be removed in small, discrete sections and visually assessed for any staining or abnormalities. Debris will be further segregated into metals, concrete, and wooded stockpiles and further evaluated prior to loading. Analytical is anticipated to be performed on a representative sample of the wood and concrete debris to determine the appropriate landfill. It is highly unlikely that representative sample of the debris will show the C&D material will be hazardous, or TSCA regulated.

Attachment: ALS Laboratories Final Report – HST 18100338 Final Level II.

All of the wipe samples (16) were taken from various locations on the building and were collected by Weston Solutions, Inc. representatives.

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